

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ULKU ROWE,

Plaintiff,

-v.-

GOOGLE LLC,

Defendant.

19 Civ. 08655 (JHR)

VOIR DIRE

JENNIFER H. REARDEN, United States District Judge:

**PLEASE DO NOT READ FURTHER OR WRITE ANYTHING ON**  
**THIS QUESTIONNAIRE UNTIL THE JUDGE TELLS YOU TO DO SO**

Please indicate if your answer to any of the following questions is “**yes**” by circling the number of that question. If your answer to a question is “**no**,” you need not do anything. Do not write your name or make any other marks on the questionnaire; the only marks you should make are circles around the questions for which the answer is “**yes**.” If, when asked about a “**yes**” answer, you prefer not to explain your answer in open court, please say so and we will speak at the bench.

**A. General Questions**

1. This trial is expected to last approximately five days, beginning today (October 10) and continuing through this Friday (October 13), and then resuming next Wednesday (October 18). (Trial will not be held next Monday, October 16 or Tuesday, October 17.) The jury will typically sit from 9:30 a.m. to 4:30 p.m. each day. Do you have any commitments that would interfere with your serving as a juror at a trial that is expected to end on or about Wednesday, October 18?
2. Do you have any ideas or prejudices that would prevent or hinder you from following my instructions as to the law?
3. Do you have any doubt that you will be able to apply the law as I explain it even if you disagree with it?
4. Do you have any problem accepting any of the following instructions: (a) that this is a civil case, and not a criminal case; (b) that your decision must be based solely on the evidence presented at trial and my instructions to you concerning that evidence; (c) that you are to consider the quality, and not the quantity, of the evidence presented; and (d) that your personal feelings towards the parties or their counsel may not enter into your deliberations?
5. Do you have any religious, moral, or ethical beliefs that would prevent you from passing judgment on another person or entity?
6. If you are chosen as a juror, do you know of any reason why you could not be fair and impartial?

**B. Case-Specific Questions**

7. Do you have any personal knowledge of this case between Ulku Rowe and Google?
8. Have you read or heard anything about this case through the media, the Internet, or any other source?

9. Can you treat Google, a corporation, and Ms. Rowe as equals under the law, giving both of them equal treatment during the trial?
10. Is there anything about the nature of this case that would cause you to be unable to render a fair and impartial verdict?
11. In general, have you formed any opinions—positive or negative—about Silicon Valley (or “Big Tech”) companies?
12. Do you now, or have you ever, owned your own business or been a manager within a business?
13. Are you now, or have you ever been, a supervisor of employees?
14. Have you, or has any member of your family or anyone in your household, ever had responsibility for hiring employees?
15. Have you, or has any member of your family or anyone in your household, had responsibility for determining the salary or wages of other employees?
16. Have you or anyone close to you (including family members) been employed in a human resources position or other position that involved the administration or application of equal pay laws, anti-discrimination laws, or anti-retaliation laws?
17. Have you, or has anyone in your household, ever had responsibility for promoting employees?
18. Do you or does anyone in your household work for a technology company?
19. Do you or does anyone in your household have any training in the area of computer engineering?
20. Have you, any member of your family, or any of your friends ever been denied a position or promotion, demoted, transferred, discharged, or laid off from any job for any reason?
21. Have you ever felt like a manager, supervisor or coworker or a potential employer discriminated against you?
22. Have you ever had an experience with an employer that was so bad it made you want to leave the company?
23. Has a coworker or other employee ever accused you or a member of your family or household of discrimination or retaliation?

24. Have you, or has any member of your family or household, ever complained of discrimination, either internally with your/their employer, or externally with a government agency or a court?

C. Knowledge of Parties, Lawyers, and Witnesses

25. The Plaintiff in this case is Ulku Rowe, and she is represented by attorneys Cara Greene, Gregory Chiarello, and Shira Gelfand of the law firm Outten & Golden LLP. Do you know, or have you had any personal or business dealings with, the Plaintiff, the Plaintiff's counsel, or her counsel's law firm?

26. The Defendant in this case is Google, and it is represented by attorneys Kenneth Gage, Sara Tomezsko, and Kaveh Dabashi of the law firm Paul Hastings LLP. Do you know, or have you had any personal or business dealings with, the Defendant, the Defendant's counsel, or its counsel's law firm?

27. Have you had any dealings with Google as a customer, stockholder, or in any other way, that has caused you to have particularly positive or negative feelings about the company?

28. Have you had any business dealings of any kind with Google, beyond simply using Google's search engine or any Google products like Gmail?

29. Do you have any relatives, friends, associates, or employers who have had any dealings with, visited the offices of, or been employed by, the parties or any of their attorneys?

30. Do you know, or have you heard of, any of the following people who may testify or whose names may be mentioned during the course of the trial?

- a. April Beaupain
- b. Stuart Breslow
- c. Jennifer Burdis
- d. Krista Callaghan
- e. Evren Eryurek
- f. Patricia Florissi
- g. William Grannis
- h. Diane Greene
- i. Nicholas Harteau
- j. Christopher Humez
- k. Kirsten Kliphouse
- l. Melissa Lawrence
- m. Kevin Lucas
- n. Nora Ostrofe
- o. David Rensin

- p. Tariq Shaukat
- q. Brian Stevens
- r. Ashley Tessier
- s. Stuart Vardaman
- t. Benjamin Wilson

31. Are you familiar with anyone else present in the courtroom, including your fellow jurors, all Court personnel, and myself?

D. Experience with, and Opinions of, Lawsuits

- 32. Have you, or has anyone close to you, ever studied or practiced law or worked in any capacity for a law office?
- 33. Have you, or has any member of your immediate family, ever brought a lawsuit against anyone?
- 34. Have you, or has any member of your immediate family, ever been sued?
- 35. Have you, or has any member of your immediate family, ever appeared as a witness either at a trial or at another legal proceeding?
- 36. Do you believe that it is wrong or improper for a person to bring a lawsuit?
- 37. Do you believe that simply because someone brings a lawsuit, there must be merit to the allegations in the lawsuit?
- 38. Do you believe that simply because someone brings a lawsuit, that must mean the person deserves to get money?

E. Difficulties in Understanding or Serving

- 39. Do you have a problem with your hearing or vision that that could affect your perception of the proceedings?
- 40. Do you have any physical or medical issues (including any medication that you might be taking) that might interfere with your service as a juror in this case?
- 41. Do you have any difficulty in reading or understanding English?
- 42. In these questions, I have tried to direct your attention to possible reasons why you might not be able to sit as a fair and impartial juror. Apart from any prior question I have asked you, is there *any* reason that you could *not* be a conscientious, fair, and impartial juror in this case, and render a true and just verdict without fear, favor, sympathy, or prejudice, according to the law as I will explain it to you?

**Questions for Individual Prospective Jurors**

1. Please state your name and county of residence. Please list each county of residence during the past 5 years.
2. How old are you?
3. How far did you go in school?
4. Who is your employer? (If retired or unemployed, who was your last employer before retiring?)
5. What do you do? (If retired or unemployed, what was your occupation before retiring?)
6. How long have you worked at your current employer?
7. How long have you been employed in your current position? If fewer than five years, where else did you work in the last five years?
8. Are you married or do you live with someone? If so, what is that person's occupation and employer? (If that person is retired or currently not working outside the home, what was their most recent occupation?)
9. Do you have children? How old are they? If you have grown children, what are their occupations and employers? (If your children are retired, what kind of work did they do prior to retirement?)
10. Where do you typically get your news? For example, what print newspapers, magazines, television shows, radio shows, podcasts, Internet news site(s), or apps do you read, watch, or listen to on a regular basis?
11. Do you belong to or volunteer your time to any associations, organizations, clubs, or unions?
12. What do you like to do in your spare time?
13. Have you ever served as a juror? If so, when did you serve and was it a civil or criminal case? Were you the foreperson? Did you reach a verdict? (**Do not state what the verdict was.**)